



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking on the Commission's Own
Motion into the Service Quality Standards for All
Telecommunications Carriers and Revisions to General
Order 133-B

Rulemaking 02-12-004
(Filed December 5, 2002)

**REPLY COMMENTS OF OMNIPOINT COMMUNICATIONS, INC., dba T-MOBILE
(U-3056-C) ON SCOPING MEMO ISSUES**

Leon M. Bloomfield
WILSON & BLOOMFIELD LLP
1901 Harrison Street, Suite 1620
Oakland, CA 94612
Telephone: (510) 625-8250
Facsimile: (510) 625-8253
E-Mail: lmb@wblaw.net

Attorneys for Omnipoint Communications, Inc.,
dba T-Mobile

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Pursuant to the procedural schedule set forth in this proceeding, T-Mobile respectfully submits these limited reply comments to the Division of Ratepayer Advocates ("DRA") and The Utility Reform Network ("TURN") May 14, 2007 comments submitted in the above-referenced rulemaking.

I. INTRODUCTION

DRA and TURN seem to either ignore or fail to understand the realities of today's telecommunications market and instead seek to impose a new set of Commission-mandated obligations and service quality metrics on all carriers under the guise that they are necessary to assure a minimum level of service for consumers.

In the context of an industry dominated by monopoly players (such as the traditional local exchange market), there was at least some basis for the imposition of regulated service quality standards. In that instance, consumers were forced to accept whatever service the monopoly provided since, by definition and as a practical matter, the consumer had no opportunity to take his or her business elsewhere. Thus, the Commission's ability to enforce standards on monopoly

carriers played a potentially critical role in ensuring that consumers had access to at least some minimum quality of service. In light of the competitive environment recognized in the Commission's URF I decision,¹ it is at best unclear whether there is still a need for service quality standards in the wireline industry. However, in the highly competitive wireless market, there has been no need, nor is there currently any need, (or policy argument) to impose such requirements.

As discussed below, DRA's and TURN's proposals fail to appreciate current carrier practices, the tools already available to consumers, and the many benefits of consumer choice found in a competitive market. Thus, T-Mobile respectfully suggests that the Commission reject those proposals at this time.²

II. DRA's COMMENTS ON WIRELESS SERVICE COVERAGE MAPS ARE MISLEADING AND INAPPROPRIATE

According to DRA, "no carrier or reseller makes available signal strength and coverage data of sufficient detail to allow consumers to make meaningful purchase decisions based on the quality of the wireless providers' signal coverage."³ This statement is simply untrue and reflects, at best, a fundamental misunderstanding of current carrier practices and the functioning of a competitive market.

¹ See D. 06-08-030 (finding that the telecommunications market for the major ILECs is now competitive).

² T-Mobile notes that the imposition of service quality measures, as well as the mechanisms to enforce such measures, seem to violate Section 332(c)(3)(A)'s prohibition on the regulation of rates and entry. As the FCC has clearly articulated, "[a] carrier may charge whatever price it wishes and provide the level of service it wishes, as long as it does not misrepresent either the price or the *quality of service*." See *In re Wireless Consumers Alliance*, 15 FCC Rcd 17021 (2000) at ¶ 29. (emphasis added).

³ *Id.*, at p. 8.

First, many carriers provide the type of coverage information referenced in the DRA comments. In fact, a simple review of the carriers' websites confirms that T-Mobile,⁴ like all of the major wireless carriers, currently provides consumers with detailed coverage maps on service coverage at designated locations – *all the way down to street level*. T-Mobile refers to this consumer tool as a “Personal Coverage Check” and its mapping function is based on the same coverage data used for internal engineering purposes.⁵ Moreover, T-Mobile, like the other carriers that provide this information, does so in such a manner that the information can be easily understood and manipulated by consumers to provide them with the information they seek.

Second, the information is readily accessible. For example, if a consumer goes to the T-Mobile website (www.T-Mobile.com), they can obtain street level coverage maps for essentially any location in the country. In fact, the T-Mobile home page provides consumers with at least two direct methods for accessing the Personal Coverage Check function. In an effort to make this function even more user-friendly, T-Mobile's Personal Coverage Check offers consumers at least *four* ways to identify a particular location; e.g., by zip code, street address, intersection or by landmark. Thus, consumers are virtually assured of being able to find their location(s) of interest. Once a consumer has identified the location he or she wants to check, the mapping functionality allows the user to “zoom” in or out of the selected geographic location depending on what level of detailed information that consumer is looking for. The T-Mobile mapping function is color-coded to indicate what level of predicted coverage can be expected at any given location; it also includes a key that associates each color with the predicted level of coverage

⁴ T-Mobile was the first national wireless carrier to provide consumers with access to these types of coverage maps and has been doing so since at least 2005.

⁵ See e.g., September 29, 2005 Hearing Transcript in R. 00-02-004 at 1356: 8-11 (Conn Testimony) (“The data in that tool is based on our internal engineering models of predicted coverage, and is the best information that we have available about coverage.”)

(i.e., the expected signal strength, if any) at that location.⁶ In addition, consumers, not just subscribers, can use this service *at any time, at no charge* to check as many or as few locations as they desire and to print out the results of their inquiries. T-Mobile also provides this mapping capability to consumers at its retail stores as well. In fact, T-Mobile sales representatives are trained to encourage consumers to check their expected level of coverage using the Personal Coverage Check before they enroll for service.⁷

Third, these maps, in fact any coverage maps, are not guarantees that service will be available at any particular location at any particular time.⁸ In fact, such a concept is inherently inconsistent with wireless technology. As the Commission is well aware, wireless service is dependent on radio signal technology and there are many factors (e.g., terrain, weather, foliage and traffic volumes) which can interfere with any radio signal at any given time. Moreover, carriers like T-Mobile are always striving to enhance their networks so mapping becomes a dynamic process. Thus, service coverage maps *are not designed* to guarantee coverage but to

⁶ The key also provides an indication of whether the level of coverage is predicted to be sufficient for in-building, in-car or outdoor coverage. Clearly, actual coverage in a given location varies depending on the particular circumstances.

⁷ See generally, September 29, 2005 Hearing Transcript in R. 00-02-004 at 1356: 5-22 (Conn Testimony) (discussing Personal Coverage Check); see also Conn Reply Testimony in R. 00-02-004 (August 15, 2005), Hearing Exhibit 18 at pp. 9.

T-Mobile notes that DRA seems to insinuate that its sales representative was acting improperly when he apparently encouraged Mr. Wittman to use the Personal Coverage Check and not to rely on the less detailed, pre-printed national maps. See DRA Brief at 7-8. The sales representative, however, was doing exactly what was expected of him by suggesting that Mr. Wittman do a Personal Coverage Check. *Id.* at Appendix C. Ironically, DRA seems to be complaining that the sales representative showed its investigator exactly the tool that DRA seems to want the carriers to provide.

give consumers an idea of the type of service generally predicted to be available in a given area. Consumers can use this type of information to determine if a particular service provider has (or for that matter, does not have) predicted coverage in areas where the consumer is likely to use his or her cell phone. Moreover, and perhaps most importantly, the coverage information – when combined with the trial periods offered by all carriers – allows consumers a particularly popular and effective way to make informed decisions about the services they are choosing.

Fourth, the fact that the carriers provide this information in different formats or with different functionality, or that some carriers may choose not to provide this information, is the hallmark of a competitive market. Consumers are more than capable of choosing those carriers that provide them with the type of information that suits their particular needs. It should not be for the DRA, or the Commission, or any other party, to determine what or how those services are offered, provided the services are offered fairly and honestly.

Finally, the DRA proposal, and the supposed “evidence” used to support its position, disregards all of this. Instead, the DRA comments focus on the record developed in a separate proceeding regarding a particular situation that occurred some six or seven years ago with one carrier (before T-Mobile even entered the California market), ignore current carrier practices, and generally fail to appreciate the role of consumer choice in a competitive market. For the reasons discussed above, this proposal should be rejected here as it has been rejected by the Commission in the past.

⁸ DRA also asserts that “T-Mobile’s map appears to contradict the statement of its own sales representatives.” DRA Brief at pg. 8. To the contrary, T-Mobile’s sales representative was apparently merely pointing out what is common knowledge; i.e., maps cannot guarantee coverage at any particular location at any particular time and thus trial periods play an important role in deciding whether a particular carrier’s service is appropriate to meet the individual needs of a consumer. In fact, the Personal Coverage Check explicitly acknowledges the predictive nature of the information being provided.

III. DRA's PROPOSED SERVICE QUALITY SURVEY AND REPORT CARD IS UNNECESSARY AND MISGUIDED

A. Service Quality Surveys as Advanced by DRA are Unnecessary and are Potentially Harmful to the Competitive Marketplace

DRA proposes that the surveys being advanced in the URF proceeding should include questions regarding service quality for both wireline and wireless service and that the survey results should be posted on the Commission's website in a "report card" type format. The Commission should reject these proposals.

As an initial matter, and as noted in the opening comments of numerous parties, a Commission sponsored survey is unnecessary given that numerous independent organizations already produce publicly available customer satisfaction and service quality data.⁹ These entities are well-respected and have considerable expertise and experience in conducting such surveys. Moreover, there is nothing to suggest that the Commission could or should take on that task or that such a survey would provide any additional material benefits to consumers.

B. DRA's Proposed Report Card Could Distort the Market and the Carriers' Ability to Address Consumer Concerns

DRA's proposed "report card" would also likely lead to distortions in the market. For example, the publication of such information could inadvertently lead consumers to believe that the government is endorsing the services of certain carriers. Such an endorsement, even if unintentional, runs counter to a truly competitive market. It also raises serious concerns about the appropriate role government should play in that market.

⁹ See e.g., CTIA Comments at pp. 3-7 (identifying several existing market surveys on wireless service quality and customer satisfaction); see also Declaration of Michael Fernandez Supporting the Opening Comment of the Verizon California Inc and its Certificated California Affiliates., R. 02-12-004, at p.3; Comments of Joint Commenting Parties in Response to Assigned Commissioner's Ruling Assigned Commissioner's Ruling and Scoping Memo, R. 02-12-004 (May 14, 2007) at pp. 3-4.

Moreover, DRA's report card would likely, and paradoxically, shift resources away from services and products desired by consumers (e.g., expanded service coverage, customer service and reasonable rates) and towards satisfying metrics imposed by the Commission. Again, T-Mobile advocates their proposal should be rejected.¹⁰

IV. TURN'S PROPOSALS ARE MISGUIDED

TURN proposes to impose service metrics on all wireless carriers, require quarterly reporting by carriers and to publish the results on the Commission website. TURN suggests that without such metrics, consumers would be left without anything to rely on but the "marketing hype of various competitors".¹¹ As discussed below, however, TURN's proposals are misguided.

¹⁰ DRA also suggests that the Commission require carriers to submit their FCC Service Outage Reports to the Commission. See DRA Comments at 18. DRA however, fails to articulate why the Commission would want such information or how this information is relevant to the issues in this proceeding. Moreover, DRA seems to disregard the highly confidential nature of the FCC reports. See In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, FCC 04-188, ET Docket No. 04-35, Report and Order and Notice of Further Rulemaking (August 19, 2004), at ¶ 45 ("Accordingly, the potential consumer benefits that we [the FCC] pointed to over a decade ago as a public interest factor weighing against routine treatment of outage reports as confidential information, are now substantially outweighed by the potential harm to the public and national defense that might result from disclosure.") Perhaps most importantly, DRA fails to explain why, if the Commission desires this information, it should not seek it through the Department of Homeland Security as contemplated by the FCC. Id. at ¶ 47.

DRA also suggests that service providers be required to prepare and submit a report comparable to the annual summary report that eligible telecommunications carriers ("ETCs") submit to the FCC on outages affecting 10% or more of customers and that such reports be made public. Such a suggestion is completely misguided. If a carrier chooses to become an ETC in California, it has certain rights and obligations associated with that designation. If not, then those obligations are not applicable. Moreover, the publication of such information could pose a serious security risk as discussed above. There is simply no basis or justification to impose any such requirements on a carrier and DRA offers none.

¹¹ TURN Comments at p. 6.

First, TURN assumes (incorrectly) that carriers do not provide sufficient information to consumers and that the only source of information which a consumer has about a carrier or its products/service is the carrier itself. Neither assumption is accurate.

As has been demonstrated many times in this proceeding, and in other proceedings before this Commission, T-Mobile (as well as most other carriers) provide a wealth of information to consumers to assist them with making informed decisions in the market.¹² Moreover, as discussed above, numerous independent (and highly regarded) organizations already conduct regular wireless service quality/customer satisfaction surveys. This third-party information is generally available to the public and provides another easily accessible source of information about carriers and the services they provide. Moreover, each carrier provides consumers with a trial period or “test-drive” of the service so that consumers can determine if the service satisfies their particular needs.

Second, TURN’s proposal fails to recognize that the wireless carriers operations are designed on a nationwide -- not a statewide -- basis. Thus, for example, call centers are generally located throughout the country and handle consumer inquiries from customers regardless of where they may be located or where they may be using their service. Moreover, wireless carriers use different technologies and have different back-office systems thus making certain types of comparisons meaningless or at least extremely difficult. Thus, even if the type of metrics suggested by TURN were appropriate, which they are not, the data is not likely to be available or useful.

¹² See e.g., September 29, 2005 Hearing Transcript in R. 00-02-004 at 1355:25 – 1360:8 (Conn Testimony); see also Conn Reply Testimony in R. 00-02-004 (August 15, 2005), Hearing Exhibit 18 at pp. 9-13; Opening Brief of T-Mobile in R. 00-02-004 (October 24, 2005) at pp. 8.

Third, TURN's suggestion that carriers make their own service quality measurements publicly available ignores the fact that the ultimate test of wireless service is how it functions for a particular consumer, which is why T-Mobile, like other carriers, provides trial periods. Moreover, the carrier's internal data on their network is highly individualized, as well as confidential and proprietary. The publication of such data would be inappropriate, present possible security risks and essentially create an "apples and oranges" comparison that would be of questionable value to consumers.¹³

Fourth, TURN offers no real justification for the particular metrics it has selected or for the "goals" it has set. Its proposal merely reflects its apparent view that consumers are not able to make intelligent choices in a competitive marketplace in the absence of government-imposed mandates.

In brief, the TURN proposal, much like that of DRA, seeks to impose obligations on competitive carriers based on a model which was developed to address potential issues in a market dominated by monopoly service providers. Such a model simply is not appropriate for the wireless industry.

¹³ Likewise, TURN's suggestion that CPUC complaint data be made public fails to acknowledge that the Commission has already recognized that the use of such information is particularly problematic. See D. 06-03-013 at 13 (discussing why reporting raw complaint data does not give an adequate representation of the scope or degree or even the existence of a problem).

V. CONCLUSION

T-Mobile respectfully submits that the proposals submitted by TURN and DRA, at least as they relate to wireless carriers, should be rejected by the Commission.

Respectfully submitted this 15th day of June, 2007, at San Francisco, California.

WILSON & BLOOMFIELD LLP

By: Leon M. Bloomfield

Attorneys for Omnipoint Communications, Inc.,
dba T-Mobile

CERTIFICATE OF SERVICE

I, Richard M. Marshall, certify that the following is true and correct:

I am employed in the City of Oakland, County of Alameda, California, am over the age of eighteen years, and am not a party to the within entitled cause. My business address is 1901 Harrison Street, Suite 1620, Oakland, CA 94612. On June 15, 2007 I served:

REPLY COMMENTS OF OMNIPOINT COMMUNICATIONS, INC., DBA T-MOBILE (U-3056-C) ON SCOPING MEMO ISSUES

attached hereto, on all parties to the attached service list for R.02-12-004. A true and correct Adobe Acrobat PDF copy was e-mailed to those parties on the service list who provided an e-mail address. For those parties who have not provided the Commission an electronic address, paper copies were served by causing true copies thereof, enclosed in sealed envelopes with postage thereon fully prepaid, to be placed in the United States Post Office mail box at Oakland, California.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on June 15, 2007 at Oakland, California.

/s/

Richard M. Marshall

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0212004 - PUC - SERVICE QUALIT

Filer: PUC

List Name: INITIAL LIST

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Appearance

CHARLES HARAK
NATIONAL CONSUMER LAW CENTER
77 SUMMER STREET, 10TH FLOOR
BOSTON, MA 02110

BARBARA R. ALEXANDER
CONSUMER AFFAIRS CONSULTANT
83 WEDGEWOOD DRIVE
WINTHROP, ME 04364

WILLIAM K. MOSCA
COMCAST BUSINESS COMMUNICATIONS, INC.
10 INDEPENDENCE WAY
WARREN, NJ 07059

LAURA L. HOLLOWAY
NEXTEL COMMUNICATIONS, INC.
2001 EDMUND HALLEY DRIVE
RESTON, VA 20091

TERRANCE SPANN
US ARMY LEGAL SERVICES AGENCY
DEPARTMENT OF THE ARMY (JALS-RL)
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203-1837

CORALETTE HANNON
ESQUIRE
AARP LEGISLATIVE REPRESENTATIVE
6705 REEDY CREEK ROAD
CHARLOTTE, NC 28215

MARK ASHBY

JEFFREY M. PFAFF

CINGULAR WIRELESS
5565 GLENRIDGE CONNECTOR, STE 1700
ATLANTA, GA 30342

SPRINT PCS
KSOPHN0212-2A509
6450 SPRINT PARKWAY
OVERLAND PARK, KS 66251-6100

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

JOHN SISEMORE
DIRECTOR
AT&T SERVICES
175 E. HOUSTON STREET, ROOM 10-M-10
SAN ANTONIO, TX 78205

KATHERINE K. MUDGE
SENIOR COUNSEL
COVAD COMMUNICATIONS COMPANY
7000 NORTH MOPAC EXPRESSWAY, 2D FL
AUSTIN, TX 78731

REX KNOWLES
REGIONAL VICE PRESIDENT
XO COMMUNICATIONS SERVICES, INC.
111 EAST BROADWAY, SUITE 1000
SALT LAKE CITY, UT 84111

ALAN L. PEPPER
MITCHELL SILBERBERG & KNUPP LLP
TRIDENT CENTER
11377 W OLYMPIC BLVD., SUITE 200
LOS ANGELES, CA 90064-1683

MICHAEL MANCHESTER
1749 10TH STREET, NO. 1
SANTA MONICA, CA 90404

ALEJANDRO JIMENEZ
AT&T MOBILITY
12900 PARK PLAZA DRIVE
TUSTIN, CA 90703

W. LEE BIDDLE
FERRIS AND BRITTON, APC
401 W. A ST., SUITE 1600
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

LAURIE ITKIN
CRICKET COMMUNICATIONS, INC.
10307 PACIFIC CENTER COURT
SAN DIEGO, CA 92121

M. ESTELA LARA
CENTRO LA FAMILIA ADVOCACY SERVICES, INC
2014 TULARE STREET, SUITE 711
FRESNO, CA 93721

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

BOB FINKELSTEIN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
ATTORNEY AT LAW
VERIZON CALIFORNIA INC.
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

RUDY REYES
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

WILLIAM NUSBAUM
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

CHARLYN A. HOOK
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JASON J. ZELLER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5030
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MONICA L. MCCRARY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5134
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KATHERINE S. RITCHEY
ATTORNEY AT LAW
JONES DAY
555 CALIFORNIA STREET, 26TH FLOOR
SAN FRANCISCO, CA 94104

RANDOLPH W. DEUTSCH
ATTORNEY AT LAW
SIDLEY, AUSTIN, BROWN & WOOD, LLP
SUITE 2000
555 CALIFORNIA STREET
SAN FRANCISCO, CA 94104

STEPHEN B. BOWEN
ATTORNEY AT LAW
BOWEN LAW GROUP
235 MONTGOMERY STREET, SUITE 920
SAN FRANCISCO, CA 94104

AGNES NG
AT&T COMMUNICATIONS OF CALIFORNIA, INC.
525 MARKET ST 20TH FLOOR 4
SAN FRANCISCO, CA 94105

ANDREA JOHNSON
AT&T CALIFORNIA
525 MARKET STREET, SUITE 1944
SAN FRANCISCO, CA 94105

DAVID P. DISCHER
GENERAL ATTORNEY
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2027
SAN FRANCISCO, CA 94105

GREGORY L. CASTLE
SENIOR COUNSEL
AT&T CALIFORNIA
525 MARKET STREET, RM. 2022
SAN FRANCISCO, CA 94105

JEAN PARKER
WORKING ASSETS
101 MARKET STREET, SUITE 700
SAN FRANCISCO, CA 94105

MARY E. WAND
ATTORNEY AT LAW
MORRISON & FOERSTER LLP
425 MARKET STREET
SAN FRANCISCO, CA 94105

STEPHEN H. KUKTA
COUNSEL
SPRINT NEXTEL
201 MISSION STREET, SUITE 1400
SAN FRANCISCO, CA 94105

THOMAS J. SELHORST
AT&T CALIFORNIA
525 MARKET STREET, RM. 2023
SAN FRANCISCO, CA 94105

JAMES W. MCTARNAGHAN
ATTORNEY AT LAW
DUANE MORRIS LLP
ONE MARKET, SPEAR TOWER 2000
SAN FRANCISCO, CA 94105-1104

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
221 MAIN STREET, SUITE 800
SAN FRANCISCO, CA 94105-1906

PETER A. CASCIATO
ATTORNEY AT LAW
PETER A. CASCIATO P.C.
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

CARL K. OSHIRO
ATTORNEY AT LAW
CSBRT/CSBA
100 PINE STREET, SUITE 3110
SAN FRANCISCO, CA 94111

DOUGLAS H. BOSCO
HOLLAND & KNIGHT, LLC
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA 94111

JAMES M. TOBIN
ESQUIRE
TWO EMBARCADERO CENTER, SUITE 1800
SAN FRANCISCO, CA 94111

JEFFREY F. BECK
ATTORNEY AT LAW
COOPER, WHITE & COOPER ,L.L.P.
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

JOHN CLARK
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, 9TH FLOOR
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

LUIS ARTEAGA
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

SARAH DEYOUNG
EXECUTIVE DIRECTOR
CALTEL

SARAH E. LEEPER
ATTORNEY AT LAW
STEEFEL, LEVITT & WEISS

50 CALIFORNIA STREET, SUITE 1500
SAN FRANCISCO, CA 94111

ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

EARL NICHOLAS SELBY
ATTORNEY AT LAW
LAW OFFICES OF EARL NICHOLAS SELBY
418 FLORENCE STREET
PALO ALTO, CA 94301

JOHN GUTIERREZ
DIRECTOR, GOVERNMENT AFFAIRS
COMCAST PHONE OF CALIFORNIA, LLC
12647 ALCOSTA BLVD., SUITE 200
SAN RAMON, CA 94583

ANITA C. TAFF-RICE
ATTORNEY AT LAW
1547 PALOS VERDES MALL, SUITE 298
WALNUT CREEK, CA 94597

DOUG GARRETT
COX CALIFORNIA TELCOM LLC
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

JOSE JIMENEZ
COX CALIFORNIA TELCOM, L.L.C.
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

MARILYN ASH
U.S. TELEPACIFIC CORP.
6101 CHRISTIE AVE.
EMERYVILLE, CA 94608

GLENN SEMOW
CALIFORNIA CABLE & TELECOMM. ASSOC.
360 22ND STREET, STE. 750
OAKLAND, CA 94612

LEON M. BLOOMFIELD
ATTORNEY AT LAW
WILSON & BLOOMFIELD, LLP
1901 HARRISON STREET, SUITE 1620
OAKLAND, CA 94612

LESLA LEHTONEN
VP LEGAL AND REGULATORY AFFAIRS
CALIFORNIA CABLE & TELECOM ASSOCIATION
360 22ND STREET, SUITE 750
OAKLAND, CA 94612

ETHAN SPRAGUE

GAYATRI SCHILBERG

PAC-WEST TELECOMM, INC.
1776 W. MARCH LANE, SUITE 250
STOCKTON, CA 95207

JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605

LUPE DE LA CRUZ
AARP CALIFORNIA
1415 L ST STE 960
SACRAMENTO, CA 95814-3977

CINDY MANHEIM
CINGULAR WIRELESS
PO BOX 97061
REDMOND, WA 98073-9761

Information Only

ROBERT SPANGLER
SNAVELY ING & MAJOROS O'CONNOR & LEE INC
1220 L STREET N.W. SUITE 410
WASHINGTON, DC 20005

WILLIAM D. WALLACE ESQ.
VERIZON WIRELESS
1300 I STREET, N.W., SUITE 400 WEST
WASHINGTON, DC 20005

MAUREEN K. FLOOD
TELECOM POLICY ANALYST
HARRIS, WILTSHIRE & GRANNIS LLP
1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

MICHAEL R. ROMANO
DIRECTOR-STATE REGULATORY AFFAIRS
LEVEL 3 COMMUNICATIONS, LLC
2300 CORPORATE PARK DR STE. 600
HERNDON, VA 20171-4845

ROBERT N. KITTEL
U.S. ARMY LITIGATION CENTER
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203-1837

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

MARJORIE O. HERLTH
QWEST COMMUNICATIONS CORPORATION
1801 CALIFORNIA ST., SUITE 4700
DENVER, CO 80202

ALOA STEVENS
DIRECTOR, GOVERNMENT&EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 708970

SANDY, UT 84070-8970

CHRISTINA V. TUSAN
ATTORNEY AT LAW
CALIFORNIA DEPARTMENT OF JUSTICE
300 SOUTH SPRING ST., 11TH FLOOR
LOS ANGELES, CA 90012

PAMELA PRESSLEY
LITIGATION PROGRAM DIRECTOR
FOUNDATION FOR TAXPAYER&CONSUMER RIGHTS
1750 OCEAN PARK BLVD., SUITE 200
SANTA MONICA, CA 90405

JACQUE LOPEZ
LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

MICHAEL BAGLEY
VERIZON WIRELESS
15505 SAND CANYON AVENUE
IRVINE, CA 92612

THOMAS MAHR
VICE PRESIDENT AND GENERAL COUNSEL
VERIZON WIRELESS
15505 SAN CANYON AVE E305
IRVINE, CA 92618

MIKE MULKEY
ARRIVAL COMMUNICATIONS
1807 19TH STREET
BAKERSFIELD, CA 93301

JAN HEWITT
AT&T CALIFORNIA
REGULATORY DEPT.
525 MARKET ST., ROOM 1803
SAN FRANCISCO, CA 94105

TERESA M. ONO
AT&T COMMUNICATIONS OF CALIFORNIA, INC.
525 MARKET ST. 18TH FLOOR, 4
SAN FRANCISCO, CA 94105

YVETTE HOGUE
EXECUTIVE DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1918
SAN FRANCISCO, CA 94105-2727

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP

SAN FRANCISCO, CA 94107

505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

SEAN P. BEATTY
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

TERRENCE E. SCOTT
SBC ADVANCED SOLUTIONS, INC.
2623 CAMINO RAMON, ROOM 2C111
SAN RAMON, CA 94583

KRISTIN JACOBSON
MARKET ATTORNEY, CONSULTANT
NEXTEL OF CALIFORNIA, INC.
1255 TREAT BLVD., SUITE 800
WALNUT CREEK, CA 94596

MARIA POLITZER
CALIFORNIA CABLE & TELECOM ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

JOSH P. THIERIOT
REGULATORY TEAM
PAC-WEST TELECOMM
1776 W. MARCH LANE, SUITE 250
STOCKTON, CA 95207

JOSH THIERIOT
PAC-WEST TELECOMM, INC.
1776 W. MARCH LN, STE. 250
STOCKTON, CA 95207

CHARLES E. BORN
MANAGER-STATE GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS TELECOMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

MARGARET FELTS

SUSAN LIPPER

PRESIDENT
CALIFORNIA COMMUNICATIONS ASSN
1851 HERITAGE LANE STE 255
SACRAMENTO, CA 95815-4923

SENIOR MANAGER, GOVERNMENT AFFAIRS
T-MOBILE USA, INC.
1755 CREEKSIDE OAKS DIVE, SUITE 190
SACRAMENTO, CA 95833

SHEILA HARRIS
MANAGER, GOVERNMENT AFFAIRS
INTEGRA TELECOM HOLDINGS, INC.
1201 NE LLOYD BLVD., STE.500
PORTLAND, OR 97232

ADAM L. SHERR
ATTORNEY AT LAW
QWEST COMMUNICATIONS CORPORATION
1600 7TH AVENUE, 3206
SEATTLE, WA 98191-0000

ANDREW O. ISAR
DIRECTOR-STATE AFFAIRS
ASSOCIATION OF COMMUNICATIONS ENTERPRISE
7901 SKANSIE AVE., SUITE 240
GIG HARBOR, WA 98335

State Service

JOEY PERMAN
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

CHRIS WITTEMAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5129
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DALE PIIRU
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DANA APPLING
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF RATEPAYERS ADVOCATES
ROOM 4201
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DENISE MANN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FALINE FUA
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANICE L. GRAU
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5011
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOHN M. LEUTZA
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS DIVISION
ROOM 3210
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN MILLER
CALIF PUBLIC UTILITIES COMMISSION
PUBLIC ADVISOR OFFICE
ROOM 2103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINDA J. WOODS
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINETTE YOUNG
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARY JO BORAK
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD SMITH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RUDY SASTRA
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARITA SARVATE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAMES W. HOWARD
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

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